

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

MALLINCKRODT PLC, *et al.*,Debtors.¹

OPIOID MASTER DISBURSEMENT TRUST II,

Plaintiff,

V.

ARGOS CAPITAL APPRECIATION MASTER FUND LP; BARCLAYS CAPITAL, INC.; BEC CAPITAL LLC; BLACKROCK INSTITUTIONAL TRUST COMPANY, N.A. (UK BRANCH); BLACKROCK INTERNATIONAL LIMITED; BLACKSTONE SENFINA ADVISORS LLC; BLUE RIDGE CAPITAL HOLDINGS LLC; BLUE RIDGE CAPITAL LLC; CAPITAL FUND MANAGEMENT SA; CAPITAL GROWTH MANAGEMENT LIMITED PARTNERSHIP; CARLSON CAPITAL LP; CHESTER DRIVE CAPITAL LP; CHIMERA SECURITIES LLC; CITADEL SECURITIES LLC; CLEAR STREET MARKETS LLC a/k/a SUMMIT SECURITIES GROUP LLC; CONSONANCE CAPITAL MANAGEMENT LP; CUTLER GROUP LLC a/k/a CUTLER GROUP LP; D.E. SHAW ASYMPTOTE PORTFOLIOS LLC; D.E. SHAW VALENCE PORTFOLIOS LLC; DEUTSCHE BANK AG; EG MARKET TECHNOLOGIES LLC; ELEMENT CAPITAL MANAGEMENT LLC; ENGINEERS GATE MANAGER LP; ERGOTELES LLC; EVERPOINT ASSOCIATES LLC; G1 EXECUTION SERVICES LLC; GF TRADING LLC; GTS SECURITIES LLC; HEALTHCOR MANAGEMENT LP; HEHMEYER LLC; HOPLITE CAPITAL LLC; HRT EXECUTION SERVICES LLC; HRT EXECUTION SERVICES, LLC a/k/a SUN TRADING LLC; HRT FINANCIAL LP; HRT

¹ A complete list of the Debtors in the chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <http://restructuring.primeclerk.com/Mallinckrodt>.

FINANCIAL L P a/k/a HRT FINANCIAL LLC; IMC-)
 CHICAGO LLC d/b/a IMC FINANCIAL MARKETS;)
 JANE STREET CAPITAL LLC; JUMP TRADING LLC;)
 KOREA INVESTMENT CORPORATION; LATOUR)
 TRADING LLC; LION CAVE CAPITAL LLC; LION)
 CAVE MANAGEMENT LLC; MERRILL LYNCH,)
 PIERCE, FENNER & SMITH INCORPORATED;)
 MOORE CAPITAL MANAGEMENT LP; PALOMINO)
 LIMITED; PAULSON & CO., INC.; PFM HEALTH)
 SCIENCES LP a/k/a PARTNER FUND MANAGEMENT)
 LP; POTAMUS HOLDINGS LLC a/k/a POTAMUS)
 TRADING LLC; QUANTBOT MANAGEMENT)
 MASTER FUND SPC LTD; QUANTITATIVE)
 INVESTMENT MANAGEMENT LLC; QUANTLAB)
 SECURITIES LP; QUANTLAB TRADING PARTNERS)
 US LP; RESILIENT CAPITAL LLP; RGM SECURITIES)
 LLC; RIEF RMP LLC; RIEF TRADING LLC; ROCK)
 CREEK MB LLC; SIMPLEX TRADING LLC; SPIRE X)
 TRADING LLC; SQUAREPOINT OPS LLC;)
 SUSQUEHANNA SECURITIES LLC; SVB)
 SECURITIES LLC a/k/a LEERINK PARTNERS LLC; T.)
 ROWE PRICE ASSOCIATES, INC., AND JOHN DOE)
 FUNDS; T3 TRADING GROUP LLC; TEWKSBURY)
 INVESTMENT FUND LTD; THESYS TECHNOLOGIES)
 LLC; TOWER RESEARCH CAPITAL LLC;)
 TRADEBOT SYSTEMS, INC.; TRILLIUM TRADING)
 LLC; VA MANAGEMENT LP a/k/a VISIUM ASSET)
 MANAGEMENT LP; VIRTU AMERICAS LLC a/k/a)
 KCG AMERICAS LLC; VIRTU AMERICAS, LLC a/k/a)
 VIRTU FINANCIAL BD LLC; WILLIAM BLAIR &)
 COMPANY LLC; XTX MARKETS LLC, and JOHN)
 DOE DEFENDANTS, and)
)
)
 HRT FINANCIAL LP, PAULSON & CO., INC. and)
 CUTLER GROUP LP on behalf of themselves and a class)
 of similarly situated persons and legal entities,)
)
)
 Defendants.)

COMPLAINT

FILED UNDER SEAL